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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**TUCK WOODSTOCK; DOUG BROWN;
SAM GEHRKE; MATHIEU LEWIS-
ROLLAND; KAT MAHONEY; JOHN
RUDOFF**; and those similarly situated,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal
corporation; and **JOHN DOES 1-60**,
individual and supervisory officers of Portland
Police Bureau and other agencies working in
concert,

Defendants.

Case No. 3:20-cv-01035-SI

**SUPPLEMENTAL DECLARATION OF
MATTHEW BORDEN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**


I, Matthew Borden, declare:

1. I am an attorney at BraunHagey & Borden LLP, located in San Francisco, California. I am duly licensed to practice law before all courts in the State of California. I have applied to appear *pro hac vice* in this action as counsel of record for Plaintiffs. I base this declaration on facts within my personal knowledge and if called upon to testify, I could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of an email sent from Oregon House Speaker Tina Kotek to Mayor Wheeler on July 1, 2020, which is available at the following URL: https://www.facebook.com/speakerkotek/posts/2248347975323164?__tn__=-R.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: July 1, 2020


Matthew Borden